

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**PAUL J. MANAFORT, JR.,**

**Defendant.**

**Crim. No. 17-201-1 (ABJ)**

**SUPPLEMENTAL DECLARATION IN SUPPORT OF GOVERNMENT’S OPPOSITION  
TO DEFENDANT PAUL J. MANAFORT, JR.’S MOTION TO MODIFY CONDITIONS  
OF RELEASE**

I, Brock W. Domin, hereby state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) working directly with the Special Counsel’s Office.

2. I submit this declaration in further support of the government’s opposition to defendant Manafort’s motion to modify his conditions of release.

3. This declaration is based upon my personal knowledge, my review of documents and other evidence, my conversations with other law enforcement personnel, and my training and experience. Because this declaration is being submitted for a limited purpose, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents are reported herein, they are reported in substance and in pertinent part.

4. Exhibit C is a copy of August 21, 2016, e-mail correspondence between Manafort and Gates regarding “Narratives.” In this correspondence, Manafort asks Gates whether he had “do[ne] them for the 3 main attacks[:] 1. Cash ledger[,] 2. Fara [. . .], and] 3. Russia.” This correspondence was recovered pursuant to a court-authorized search of Gates’s e-mail account at DMP International.

5. Exhibit D contains excerpts from a September 5, 2016, e-mail from Gates to Manafort regarding “Docs.” The e-mail included the message that Gates had been assembling “documents . . . over the last couple of weeks,” and attached five documents. One of the five attachments, bearing the heading “Outline of Issues,” is included in Exhibit D after the text of the e-mail. (Unrelated pagination information inserted by the government’s document management system has been redacted on the bottom of each page.) This e-mail and the attachment were recovered pursuant to a court-authorized search of Manafort’s e-mail account at DMP International.

6. Exhibit A to my initial declaration is an e-mail from defendant Paul Manafort to Konstantin Kilimnik, a Russian national who worked for Manafort in Ukraine. Included in Exhibit A was a printed copy of the Microsoft Word file attached to Manafort’s e-mail, which contains the draft “op ed” for Oleg Voloshin. The Microsoft Word document has red tracked changes, of which “paul manafort” is listed as the electronic author.

7. Exhibit E comprises a printed copy of the tracked changes that appear in Exhibit A, a printed copy of Microsoft Word’s “List of Markup” that catalogues both the author of these changes and the time these changes were made, and metadata generated by Microsoft Word with respect to the draft op-ed that is part of Exhibit A to my initial declaration. The “List of Markup” indicates that a user of Microsoft Word who had registered as “paul manafort” made a number of insertions and deletions, including notations appearing in capital letters, in the document. These changes were made between approximately 8:41 p.m. and 9:11 p.m. last Wednesday, November 29, 2017. Similarly, the document’s metadata indicates that the file was created at 8:30 p.m. and last saved at 9:12 p.m.

8. Exhibit F is a redacted copy of an e-mail sent to an employee of the U.S. Embassy in Ukraine from an e-mail account associated with Voloshin on December 5, 2017. (The name of the employee has been redacted from the Exhibit.) The e-mail includes two attachments that, in light of the context, appear to be the following: a copy of the CNN article referenced in Voloshin's e-mail as a "sudden piece of news"; and a copy of the "draft article" that Voloshin's e-mail indicates that he "asked the Opposition Bloc press-service to forward to KYIV Post editors." The government provided this e-mail and the attachments to Manafort's counsel on December 6, 2017.

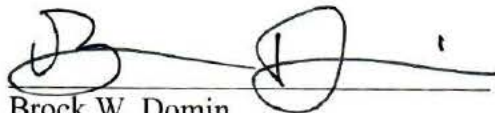
9. Exhibit G is a copy of an op-ed published in Voloshin's name on the *Kiev Post* website on December 7, 2017. See Oleg Voloshin: Paul Manafort, European integration's unknown soldier for Ukraine, *available at* <http://www.kyivpost.com/article/opinion/op-ed/oleg-voloshin-paul-manafort-european-integrations-unknown-soldier-ukraine.html> (last visited December 8, 2017).

10. Exhibit H is a comparison, prepared by the government, of both the original text and tracked changes proposed by "paul manafort" in Exhibit A with the text of the published op-ed contained in Exhibit G. (Exhibit H thus reflects a comparison of the text that results from applying the "Accept All Changes" command to Exhibit A with the relevant text of Exhibit G.)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 8, 2017.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Brock W. Domin', written over a horizontal line.

Brock W. Domin  
Special Agent, Federal Bureau of Investigation

# **EXHIBIT C**

Document ID: 0.7.4249.208258

From: rick gates </o=mex05/ou=exchange  
administrative group  
(fydibohf23spdlt)/cn=recipients/cn=rgates@dmpint.com4bb>  
To: paul manafort </o=mex05/ou=exchange  
administrative group  
(fydibohf23spdlt)/cn=recipients/cn=pmanafort@dmpint.com202>  
Cc:  
Bcc:  
Subject: Re: Narratives  
Date: Sun Aug 21 2016 20:50:43 EDT  
Attachments:

---

Working on them. Will send them tonight. What time is Alex tomorrow. Def think you need to do it.

> On Aug 21, 2016, at 19:05, Paul Manafort <pmanafort@dmpint.com> wrote:  
>  
> Did you do them for the 3 main attacks  
> 1. Cash ledger  
> 2. Fara [REDACTED]  
> 3. Russia  
>  
> I may do Alex tomorrow  
>  
> Sent from my iPhone

# **EXHIBIT D**

Document ID: 0.7.3940.630887

From: rick gates </o=mex05/ou=exchange  
administrative group  
(fydibohf23spdlt)/cn=recipients/cn=rgates@dmpint.com4bb>  
To: paul manafort </o=mex05/ou=exchange  
administrative group  
(fydibohf23spdlt)/cn=recipients/cn=pmanafort@dmpint.com202>  
Cc:  
Bcc:  
Subject: Docs  
Date: Mon Sep 05 2016 11:42:35 EDT  
Attachments: 0.7.3801.15516-000001.docx  
0.7.3801.15516-000002.docx  
0.7.3801.15516-000003.docx  
0.7.3801.15516-000004.docx  
0.7.3801.15516-000005.pdf

---

P-  
Here are all of the documents that I assembled over the last couple of weeks. I am still working on a few but this will get you well on your way to getting organized. We can discuss when you have time.

---

## **Outline of Issues**

### **Ledger**

1. Never took cash payments
2. Where is the ledger? To this day no one has been able to produce the actual ledger
3. Also where has the ledger been? Why did it appear now?
4. Official statement by NABU – Manafort not under investigation
5. FT article – GoU in bed with Clinton's – want to help them – very overt
6. Pinchuk has given millions of dollaors to Clinton Foundation among other things over the years

### **PJM work in Ukraine**

1. Never worked in Russia or for Russians
2. Work was centered on pro-Ukraine efforts to enter into the EU
3. US Government failed the people of Ukraine (Vilnius Summit)
4. VFY is not pro-Russian or pro-Putin – he did not like Putin
  - a. Putin gave money to YT in the 2010 election. VFY did not have support of Putin but YT did (no one focuses on this)
  - b. Worst trade deal in Ukraine's history was by YT (allegedly done to pay off bad debt by YT's private company)
5. PJM work focused on party building, democracy, election integrity, and winning.
6. Worked with the US embassy at their request (in many cases) for the same goals.
7. VFY fairly and transparently elected – failure of the orange revolution
  - a. Conducted more reforms than either of his predecessors (paved way for European integration)
  - b. US broke its commitment in February 2014 when VFY signed pledge not to use force
  - c. US government failed people of Ukraine
8. Subsequent work was for new political party Opposition Bloc
  - a. Supported EU membership
  - b. Supported Ukrainian independence
  - c. Supporting culture does not mean supporting Putin
  - d. Ukrainians in the east part of the country supported language, food, but not Russian political policies.
  - e. All Ukrainians wanted freedom (significance of independence in 1991)

### **PJM work in other countries**

1. Need to beat back the idea that this was nefarious work
2. You were doing work, in many cases, on behalf of the US government
3. Your efforts were in support and promotion of pro-democratic values around the world
4. Discuss the many boards, foundations you started/were on that went to support democracy around the world



**Cayman Islands**

1. This matter has been resolved and based on the documents in the EVAD court the file was terminated.
2. [Working on getting documents from Caymans evidencing that this matter is closed – we many need to discuss local attorney].

**Lobbying Issues**

1. See separate narrative.

# **EXHIBIT E**

European integration unknown soldier

Oleg Voloshyn, former spokesperson of the Ministry of Foreign Affairs of Ukraine

EU – Ukraine Association Agreement might have never appeared but for a person now falsely accused of lobbying Russian interests

The night of March 4, 2010 turned out to be a nervous one for the staff of Ukrainian embassy in Moscow where I used to be a press-attaché.

The first visit to Russia of newly elected president Viktor Yanukovich was on the brink of cancellation. The Kremlin wouldn't grant the already scheduled visit an official status. Russian state media also cancelled earlier agreed interviews with members of Yanukovich team. The explanation was rather simple although possibly unusual for contemporary observers who had a mistaken and simplified perception of the fourth Ukrainian president: Russian leadership was annoyed at Yanukovich's decision to pay his first visit after inauguration to Brussels before heading to Moscow.

Even Yushchenko in 2005 did the opposite. There was one person the Russians blamed for this "treason of special relationship with brother nation": the political consultant to Viktor Yanukovich, American strategist Paul Manafort. Manafort persuaded Yanukovich that going first to Brussels would demonstrate to all that as President, Yanukovich intended to bring the changes required to allow Ukraine to apply for formal membership in the European Union.

Manafort brought to the Ukrainian political consultancy business a very important rule: An effective leader needs to be consistent as a President with his promises as a candidate. In his Presidential campaign VY made it clear that it was important for Ukraine to maintain its historical and cultural relationship with Russia. However, Yanukovich had also promised to implement the changes that would begin the modernization of Ukraine that would be necessary for Ukraine to become a part of the EU. The Brussels trip sent this signal loudly and clearly to all – including Russia.

Also, during these early months, VY implemented other important policy changes that signaled he was serious about moving Ukraine into the western orbit:

HERE NEED TO ADD a couple of major reforms that VY brought to country in order to position Ukraine to apply for membership. Reforms that changed a Soviet based legal economic framework to a western one. (increase of NATO exercises/ Nuclear deal/

With an eye towards 2015, VY managed to protect the cultural and language concerns of Eastern Ukraine while managing the major changes required for Ukraine to come to terms with the European bureaucrats debating the particular terms of Deep and Comprehensive Free Trade Area (DCFTA) with the EU. No other nation had accomplished this task over such a brief

Deleted: dug in

Deleted: just

Deleted: sudden

Deleted: And t

Deleted: y

Deleted: basically

Deleted: at

Deleted: then

Deleted: electoral

Deleted: do all that was necessary to

Deleted: said while at the same time to

Deleted: ¶  
never spare on polls and social surveys and always base your electoral strategy on real a state of minds in the society, not the wishful one. It was that attentive attitude to polls data that unequivocally showed that European integration was the one and unique big idea that unified Ukrainian from almost all regions of our very diversified and even polarized country. As a strategist who ensured the unexpected victory of Yanukovich in 2010 presidential race Manafort couldn't but suggest his client to stick to European integration agenda to get an easier ride to re-election in 2015. ¶

Deleted: It was that factor that made initially mostly pro-Russian team of the president work extensively on rapprochement with the EU. Those who deny that version would rather struggle to explain why otherwise the "allegedly sympathetic to Moscow" Yanukovich's government had the Association Agreement initialized already in March of 2012. What shocked so many in Moscow was the pace with which Ukrainian negotiators m

Deleted: anaged

Deleted: same

period of time. Yanukovych's government had the Association Agreement initialed by March of 2012. This pace shocked Moscow.

This sense of commitment to the goal is actually the reason why Russia overreacted in the summer 2013 and imposed the trade blockade with Ukraine.

Following the European track created multiple challenges that would never had been solved by a Ukraine Government except for the consistent promotion of what had to be done by Paul Manafort.

HERE LIST SOME OF THE CHANGES TO LAWS THAT WERE MADE – CIVIL CODE/ELECTORAL CODE ETC.

Even at the end of the process Manafort was engaged in helping the Europeans and the Ukrainians negotiate the final terms.

Just three months before the summit it was the EU, not Yanukovych, who hesitated whether to sign the document or not. And Manafort contributed a lot to change the mood in Brussels and major European capitals while at the same time keeping Ukraine focused on finalizing the details of the DCFTA and Association Agreement. He was doing this while Russia was imposing the trade embargo and threatening even more drastic punishment.

With all that said I can only wonder why some American media dare falsely claim that Paul Manafort lobbied Russian interests in Ukraine and torpedoed AA signing. Without his input Ukraine would not have had the command focus on reforms that were required to be a nation candidate to the EU.

All listed here facts can be easily verified. If only one pursues the truth. Not tends to twist the reality in line with his or her conviction that the dubious goal of undermining Trump's presidency justifies most dishonest means.

Deleted: .

Formatted: Font: -webkit-standard

Deleted: That was

Deleted: had

Deleted: to nervously

Deleted: up to August

Deleted: trade blockade of

Deleted: to demonstrate its resolution to keep our country out of European clout.

Deleted: And on that

Deleted: arose

Deleted: c

Deleted: hardly be solved but for

Deleted: lobbying

Deleted: the

Deleted: idea

Deleted: who had an ear of the president

Deleted: on a more regular basis than even some of his ministers. By the way it was American consultant who most actively promoted the idea to amnesty Yuriy Lutsenko to unblock the signing of the agreement. Since Yanukovych wouldn't release Yulia Timoshenko with Lutsenko also in custody there would have been no arguments on the table to persuade German chancellor Angela Merkel to make a step towards Kyiv. Many remember embarrassing Yanukovych's U-turn at Vilnius summit when he made a last minute decision to postpone the signing of the AA. Few tend to recall the events that made Vilnius signing an option in the first place.

Deleted: of

Deleted: .

Deleted: could

Deleted: have long been in Russian clout as many of Yanukovych's voters frankly expected when they cast ballots in his favor in 2010.

Re (no subject) 11 30 17 VOLOSHIN OPED = DR 2.docx

### Main document changes and comments

Page 1: Inserted	paul manafort	11/29/2017 9:06:00 PM
------------------	---------------	-----------------------

Page 1: Inserted	paul manafort	11/29/2017 9:06:00 PM
------------------	---------------	-----------------------

The

Page 1: Inserted	paul manafort	11/29/2017 9:07:00 PM
------------------	---------------	-----------------------

who had a mistaken and

Page 1: Deleted	paul manafort	11/29/2017 9:07:00 PM
-----------------	---------------	-----------------------

dug in

Page 1: Deleted	paul manafort	11/29/2017 9:07:00 PM
-----------------	---------------	-----------------------

just

Page 1: Deleted	paul manafort	11/29/2017 9:07:00 PM
-----------------	---------------	-----------------------

sudden

Page 1: Inserted	paul manafort	11/29/2017 9:07:00 PM
------------------	---------------	-----------------------

T

Page 1: Deleted	paul manafort	11/29/2017 9:07:00 PM
-----------------	---------------	-----------------------

And t

Page 1: Inserted	paul manafort	11/29/2017 9:07:00 PM
------------------	---------------	-----------------------

Russians

Page 1: Deleted	paul manafort	11/29/2017 9:07:00 PM
-----------------	---------------	-----------------------

y

Page 1: Deleted	paul manafort	11/29/2017 9:08:00 PM
-----------------	---------------	-----------------------

basically

Page 1: Inserted	paul manafort	11/29/2017 9:08:00 PM
------------------	---------------	-----------------------

is

Page 1: Deleted	paul manafort	11/29/2017 9:08:00 PM
-----------------	---------------	-----------------------

at

Page 1: Inserted	paul manafort	11/29/2017 9:08:00 PM
------------------	---------------	-----------------------

political

Page 1: Deleted	paul manafort	11/29/2017 9:08:00 PM
-----------------	---------------	-----------------------

then

Page 1: Deleted	paul manafort	11/29/2017 9:08:00 PM
-----------------	---------------	-----------------------

electoral

Page 1: Deleted	paul manafort	11/29/2017 8:41:00 PM
-----------------	---------------	-----------------------

do all that was necessary to



Page 1: Inserted	paul Manafort	11/29/2017 9:08:00 PM
------------------	---------------	-----------------------

the

Page 1: Inserted	paul Manafort	11/29/2017 8:41:00 PM
------------------	---------------	-----------------------

anukovich had

Page 1: Inserted	paul Manafort	11/29/2017 8:42:00 PM
------------------	---------------	-----------------------

promised to implement the changes that would

Page 1: Deleted	paul Manafort	11/29/2017 8:54:00 PM
-----------------	---------------	-----------------------

said while at the same time to

Page 1: Inserted	paul Manafort	11/29/2017 8:42:00 PM
------------------	---------------	-----------------------

of the EU. The Brussels trip sent this signal loudly and clearly to all – including Russia.

Also, during these early months, VY implemented other important policy changes that signaled he was serious about moving Ukraine into the western orbit:

HERE NEED TO ADD a couple of major reforms that VY brought to country in order to position Ukraine to apply for membership. Reforms that changed a Soviet based legal economic framework to a western one. (increase of NATO exercises/ Nuclear deal/

Page 1: Deleted	paul Manafort	11/29/2017 8:42:00 PM
-----------------	---------------	-----------------------

never spare on polls and social surveys and always base your electoral strategy on real a state of minds in the society, not the wishful one. It was that attentive attitude to polls data that unequivocally showed that European integration was the one and unique big idea that unified Ukrainian from almost all regions of our very diversified and even polarized country. As a strategist who ensured the unexpected victory of Yanukovych in 2010 presidential race Manafort couldn't but suggest his client to stick to European integration agenda to get an easier ride to re-election in 2015.

Page 1: Inserted	paul Manafort	11/29/2017 8:57:00 PM
------------------	---------------	-----------------------

With an eye towards 2015, VY managed to protect the cultural and language concerns of Eastern U

Page 1: Deleted	paul Manafort	11/29/2017 8:57:00 PM
-----------------	---------------	-----------------------

It was that factor that made initially mostly pro-Russian team of the president work extensively on rapprochement with the EU. Those who deny that version would rather struggle to explain why otherwise the "allegedly sympathetic to Moscow" Yanukovych's government had the Association Agreement initialized already in March of 2012. What shocked so many in Moscow was the pace with which Ukrainian negotiators m

Page 1: Inserted	paul Manafort	11/29/2017 8:58:00 PM
------------------	---------------	-----------------------

kraine while managing the major changes required for Ukraine

Page 1: Deleted	paul Manafort	11/29/2017 8:58:00 PM
-----------------	---------------	-----------------------

anaged

Page 1: Inserted	paul manafort	11/29/2017 8:58:00 PM
------------------	---------------	-----------------------

to

Page 1: Inserted	paul manafort	11/29/2017 8:44:00 PM
------------------	---------------	-----------------------

had

Page 1: Inserted	paul manafort	11/29/2017 8:44:00 PM
------------------	---------------	-----------------------

this

Page 1: Deleted	paul manafort	11/29/2017 8:45:00 PM
-----------------	---------------	-----------------------

same

Page 2: Inserted	paul manafort	11/29/2017 9:00:00 PM
------------------	---------------	-----------------------

.

Page 2: Deleted	paul manafort	11/29/2017 9:00:00 PM
-----------------	---------------	-----------------------

.

Page 2: Inserted	paul manafort	11/29/2017 8:59:00 PM
------------------	---------------	-----------------------

Yanukovych's government had the Association Agreement initialed by March of 2012. This pace shocked Moscow.

This sense of commitment to the goal is

Page 2: Formatted	paul manafort	11/29/2017 9:02:00 PM
-------------------	---------------	-----------------------

Font: -webkit-standard

Page 2: Deleted	paul manafort	11/29/2017 8:45:00 PM
-----------------	---------------	-----------------------

That was

Page 2: Deleted	paul manafort	11/29/2017 9:09:00 PM
-----------------	---------------	-----------------------

had

Page 2: Deleted	paul manafort	11/29/2017 8:45:00 PM
-----------------	---------------	-----------------------

to nervously

Page 2: Inserted	paul manafort	11/29/2017 8:45:00 PM
------------------	---------------	-----------------------

ed

Page 2: Inserted	paul manafort	11/29/2017 8:45:00 PM
------------------	---------------	-----------------------

the

Page 2: Inserted	paul manafort	11/29/2017 8:45:00 PM
------------------	---------------	-----------------------

and imposed the trade blockade

Page 2: Deleted	paul manafort	11/29/2017 8:46:00 PM
-----------------	---------------	-----------------------

up to August

Page 2: Inserted	paul manafort	11/29/2017 8:46:00 PM
------------------	---------------	-----------------------

with

Page 2: Deleted	paul manafort	11/29/2017 8:46:00 PM
-----------------	---------------	-----------------------

trade blockade of

Page 2: Inserted	paul Manafort	11/29/2017 9:10:00 PM
------------------	---------------	-----------------------

.

Page 2: Deleted	paul Manafort	11/29/2017 9:11:00 PM
-----------------	---------------	-----------------------

to demonstrate its resolution to keep our country out of European clout.

Page 2: Inserted	paul Manafort	11/29/2017 8:46:00 PM
------------------	---------------	-----------------------

Following the European

Page 2: Deleted	paul Manafort	11/29/2017 9:02:00 PM
-----------------	---------------	-----------------------

And on that

Page 2: Inserted	paul Manafort	11/29/2017 9:02:00 PM
------------------	---------------	-----------------------

created

Page 2: Deleted	paul Manafort	11/29/2017 9:02:00 PM
-----------------	---------------	-----------------------

arose

Page 2: Inserted	paul Manafort	11/29/2017 9:02:00 PM
------------------	---------------	-----------------------

w

Page 2: Deleted	paul Manafort	11/29/2017 9:02:00 PM
-----------------	---------------	-----------------------

c

Page 2: Inserted	paul Manafort	11/29/2017 9:02:00 PM
------------------	---------------	-----------------------

never had been solved by a Ukraine Government except for the

Page 2: Deleted	paul Manafort	11/29/2017 9:03:00 PM
-----------------	---------------	-----------------------

hardly be solved but for

Page 2: Inserted	paul Manafort	11/29/2017 9:03:00 PM
------------------	---------------	-----------------------

promotion

Page 2: Deleted	paul Manafort	11/29/2017 9:03:00 PM
-----------------	---------------	-----------------------

lobbying

Page 2: Inserted	paul Manafort	11/29/2017 9:03:00 PM
------------------	---------------	-----------------------

what had to be done

Page 2: Deleted	paul Manafort	11/29/2017 9:03:00 PM
-----------------	---------------	-----------------------

the

Page 2: Deleted	paul Manafort	11/29/2017 9:03:00 PM
-----------------	---------------	-----------------------

idea

Page 2: Inserted	paul Manafort	11/29/2017 9:04:00 PM
------------------	---------------	-----------------------

.

HERE LIST SOME OF THE CHANGES TO LAWS THAT WERE MADE – CIVIL CODE/ELECTORAL CODE ETC.



Even at the end of the process Manafort was engaged in helping the Europeans and the Ukrainians negotiate the final terms.

Page 2: Deleted	paul manafort	11/29/2017 9:04:00 PM
-----------------	---------------	-----------------------

who had an ear of the president

Page 2: Inserted	paul manafort	11/29/2017 9:03:00 PM
------------------	---------------	-----------------------

Page 2: Deleted	paul manafort	11/29/2017 9:03:00 PM
-----------------	---------------	-----------------------

on a more regular basis than even some of his ministers. By the way it was American consultant who most actively promoted the idea to amnesty Yuriy Lutsenko to unblock the signing of the agreement. Since Yanukovich wouldn't release Yulia Timoshenko with Lutsenko also in custody there would have been no arguments on the table to persuade German chancellor Angela Merkel to make a step towards Kyiv. Many remember embarrassing Yanukovich's U-turn at Vilnius summit when he made a last minute decision to postpone the signing of the AA. Few tend to recall the events that made Vilnius signing an option in the first place.

Page 2: Inserted	paul manafort	11/29/2017 8:48:00 PM
------------------	---------------	-----------------------

Page 2: Inserted	paul manafort	11/29/2017 8:48:00 PM
------------------	---------------	-----------------------

the

Page 2: Deleted	paul manafort	11/29/2017 8:48:00 PM
-----------------	---------------	-----------------------

of

Page 2: Inserted	paul manafort	11/29/2017 8:50:00 PM
------------------	---------------	-----------------------

while at the same time keeping Ukraine focused on finalizing the details of the DCFTA and Association Agreement. He was doing this while Russia was imposing the trade embargo and threatening even more drastic punishment.

Page 2: Deleted	paul manafort	11/29/2017 8:50:00 PM
-----------------	---------------	-----------------------

.

Page 2: Inserted	paul manafort	11/29/2017 9:06:00 PM
------------------	---------------	-----------------------

Page 2: Inserted	paul manafort	11/29/2017 8:48:00 PM
------------------	---------------	-----------------------

would not have had the command focus on reforms that were required to be a nation candidate to the

Page 2: Deleted	paul manafort	11/29/2017 8:49:00 PM
-----------------	---------------	-----------------------

could

Page 2: Inserted	paul manafort	11/29/2017 8:49:00 PM
------------------	---------------	-----------------------

EU.

Page 2: Deleted	paul manafort	11/29/2017 8:49:00 PM
-----------------	---------------	-----------------------

have long been in Russian clout as many of Yanukovych's voters frankly expected when they cast ballots in his favor in 2010.

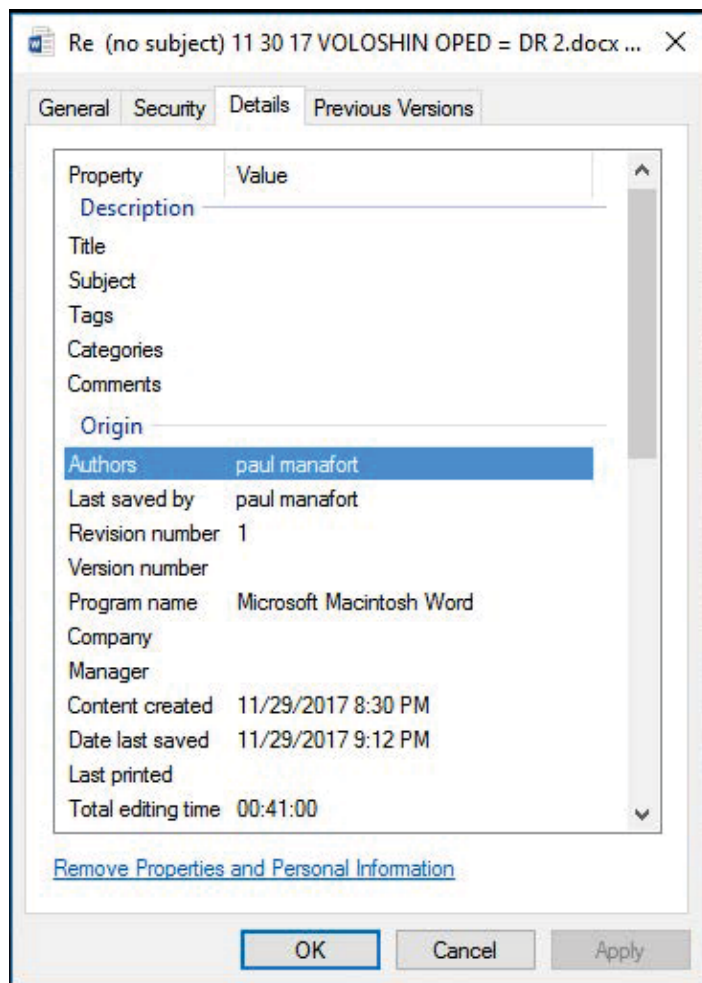
Header and footer changes

Text Box changes

Header and footer text box changes

Footnote changes

Endnote changes



# **EXHIBIT F**

NO DISCERNIBLE CLASSIFICATION

**From:** Oleg Voloshyn <oavoloshyn@gmail.com>  
**Sent:** Tuesday, December 05, 2017 12:00 PM  
**To:** [REDACTED]  
**Subject:** Very important  
**Attachments:** Олег Волошин.jpg; OV Op-Ed final.docx

Dear [REDACTED]

I feel urgent need to inform US embassy of the following with a view to that sudden piece of news:  
<http://www.cnn.com/2017/12/04/politics/manafort-bail-russian-intelligence/index.html>

In fact that statement is not fully accurate. It was me who drafted the text upon my own initiative. I felt obliged to send it to Kilimnik just to verify certain facts and he forwarded it to Manafort just to have a look as his name is mentioned there. There was no plot or big scenario behind it. As far as I know Manafort just read it and that's all. I dare claim Mueller commission deliberately twisted the reality.

Below you may find the may with draft article attached that I asked the Opposition Block press-service to forward to KYIV Post editors. It was done yesterday. Before the scandal erupted.

Please, inform the ambassador. I find it rather important to shed light on that situation.

Regards,

Oleg

----- Пересылаемое сообщение -----

От: Press Center <zapyt@ukr.net>

Дата: вт, 5 дек. 2017 г. в 10:38

Тема: Fw: Стаття О. Волошина

Кому: <oavoloshyn@gmail.com>

Добрый день! Вчера отправили такое письмо редактору Kyiv Post Ольге Руденко [rudenko@kyivpost.com](mailto:rudenko@kyivpost.com)

Добрый день, пані Ольго! Останнім часом у ЗМІ публікувалося багато матеріалів щодо Пола Манафорта, Олег Волошин мав нагоду з ним працювати і пропонує свою точку зору в якості op-ed.

Олег Волошин - у 2010-2013 рр. працював директором департаменту інформації МЗС України, а також є радником ОПОЗИЦІЙНОГО БЛОКУ з міжнародних питань. Надсилаю Вам цю статтю на прохання Олега. У випадку зауважень, Ви можете зв'язатися з ним за телефоном: 050-415-15-72 або за електронною адресою: Oleg Voloshyn <oavoloshyn@gmail.com>

Будемо вдячні за співпрацю. Висловлюємо сподівання, що зважаючи на резонансність подій, пов'язаних з ім'ям П.Манафорта, альтернативна точка зору буде опублікована на сторінках такого впливого видання як Kyivpost.

З повагою, Ірина Милинєвська.

NO DISCERNIBLE CLASSIFICATION

**Washington (CNN)**Former Trump campaign chairman Paul Manafort was ghostwriting an op-ed while out on bail last month with a Russian who has ties to the Russian intelligence service, Justice Department Special Counsel Robert Mueller's team said Monday.

In a new filing Monday afternoon, Mueller's investigators said Manafort was working on an editorial in English as late as last Thursday and that it related to his political work for Ukraine, which factored into his money-laundering and foreign lobbying criminal charges.

The filing asks for the court to revisit a bail agreement Mueller's office and Manafort's lawyers made jointly last week. The court had not yet approved a change to his \$10 million unsecured bail and house arrest.

"Even if the ghostwritten op-ed were entirely accurate, fair, and balanced, it would be a violation of this Court's November 8 Order if it had been published," prosecutors wrote. "The editorial clearly was undertaken to influence the public's opinion of defendant Manafort, or else there would be no reason to seek its publication (much less for Manafort and his long-time associate to ghostwrite it in another's name)."

Manafort has pleaded not guilty to the charges. The bail agreement the lawyers appeared to have reached would have freed him from house arrest and GPS monitoring while asking him to post more than \$11 million in real estate as collateral. Prosecutors have argued since his arrest October 30 that Manafort is a flight risk.

The judge in the case ordered in early November for Manafort, his lawyers and the prosecutors to "refrain from making statements to the media or in public settings that pose a substantial likelihood of material prejudice to this case."

Prosecutors also have asked the court for the ability to submit details about Manafort's Russian contact and the op-ed under seal, so they would remain confidential.

The judge has a status conference scheduled in the case for December 11.

<http://www.cnn.com/2017/12/04/politics/manafort-bail-russian-intelligence/index.html>

## **European Integration Unknown Soldier**

*By: Oleg Voloshyn, former spokesperson of the Ministry of Foreign Affairs of Ukraine*

EU – Ukraine Association Agreement might have never appeared but for a person now falsely accused of lobbying Russian interests.

The night of March 4, 2010 turned out to be a nervous one for the staff of Ukrainian embassy in Moscow where I used to be a press-attaché.

The first visit to Russia of newly elected president Viktor Yanukovich was on the brink of cancellation. The Kremlin wouldn't grant the already scheduled visit an official status. Russian state media also cancelled earlier agreed interviews with members of Yanukovich team. The explanation was rather simple although possibly unusual for contemporary observers who had a mistaken and simplified perception of the fourth Ukrainian president: Russian leadership was annoyed at Yanukovich's decision to pay his first visit after inauguration to Brussels before heading to Moscow.

Even Yushchenko in 2005 did the opposite. There was one person the Russians blamed for this "treason of special relationship with brother nation": the political consultant to Viktor Yanukovich, American strategist Paul Manafort. Manafort persuaded Yanukovich that going first to Brussels would demonstrate to all that as President, Yanukovich intended to bring the changes required to allow Ukraine to apply for formal membership in the European Union.

Manafort brought to the Ukrainian political consultancy business a very important rule: An effective leader needs to be consistent as a President with his promises as a candidate. In his Presidential campaign VY made it clear that it was important for Ukraine to maintain its historical and cultural relationship with Russia. However, Yanukovich had also promised to implement the changes that would begin the modernization of Ukraine that would be necessary for Ukraine to become a part of the EU. The Brussels trip sent this signal loudly and clearly to all – including Russia.

I can't but stipulate that Yanukovich was a bad president and crook who by the end of his rule had effectively lost credibility even of his staunchest supporters. And finally betrayed them and fled to Russia only to see Ukraine fall in the hands of other kleptocrats now disguised as hooray-patriots and nationalists. But with all that said one shouldn't ignore the fact that Ukraine under Yanukovich made a number of major steps towards the EU and the West in general. And that Manafort was among those who made those paradoxical accomplishments real.

# **EXHIBIT G**



# Oleg Voloshin: Paul Manafort, European integration's unknown soldier for Ukraine

By Oleg Voloshin. Published Dec. 7. Updated Dec. 7 at 8:16 pm



WASHINGTON, DC - NOVEMBER 06: Former Trump campaign manager Paul Manafort and his wife Kathleen arrive at the Prettyman Federal Courthouse for a bail hearing November 6, 2017 in Washington, DC. Manafort and his former business partner Richard Gates both pleaded not guilty Monday to a 12-charge indictment that included money laundering and conspiracy. Mark Wilson/Getty Images/AFP

Photo by AFP

*Editor's Note: The following op-ed submitted to Kyiv Post deputy chief editor Olga Rudenko on Dec. 4 has triggered controversy after U.S. Special Counsel Robert Mueller, who is investigating U.S. President Donald J. Trump's ties to Russia, accused former Trump campaign manager Paul Manafort of ghostwriting the piece to help*

*influence the criminal case against him. If Manafort did so, it would be a violation of a court order prohibiting Manafort from trying the case in the press, according to prosecutors. **Bloomberg's Stephanie Baker** reported on Dec. 5 that Mueller is now seeking to deny Manafort's bid for freedom from house arrest before his trial because of the editorial. Manafort is charged with conspiracy to launder money and acting as an unregistered agent for Ukraine. Voloshin told the Kyiv Post that he wrote the op-ed himself, sending it only to Konstantin Kilimnik, a longtime associate of Manafort in Ukraine, and Manafort for fact-checking. "It is totally mine," Voloshin said. "Paul has absolutely nothing to do with it. Eighteen months ago I gave comments along same lines to **the Guardian**. I was just annoyed at a **McClatchy publication** that falsely claimed Manafort had derailed Association Agreement with the European Union. The fact it was meant for the Kyiv Post only proves there was no intervention on behalf of Paul. It is rather difficult to influence U.S. public opinion with publication in Ukraine. As a native speaker, you can easily identify that the text was penned by a non-native speaker. So it has nothing to do with editing or writing by Paul or any other American." The op-ed was submitted to the Kyiv Post by Irina Milinevskaya, an ex-Inter TV executive, now working for the 43-member Opposition Bloc, which includes many members of the now-defunct Party of Regions led by the exiled Yanukovych.*

The European Union – Ukraine Association Agreement might have never appeared but for a person now falsely accused of lobbying Russian interests.

The night of March 4, 2010, turned out to be a nervous one for the staff of Ukrainian Embassy in Moscow where I used to be a press attaché.

The first visit to Russia of newly elected President Viktor Yanukovych was on the brink of cancellation. The Kremlin wouldn't grant the already scheduled visit an official status. Russian state media also canceled earlier agreed interviews with members of the Yanukovych team.

The explanation was rather simple although possibly unusual for contemporary observers who had a mistaken and simplified perception of the fourth Ukrainian president: The Russian leadership was annoyed at Yanukovych's decision to pay his first visit after inauguration to Brussels before heading to Moscow.

Even Viktor Yushchenko, upon taking office as Ukraine's third president in 2005, did the opposite. There was one person the Russians blamed for this "treason of special relationship with brother nation": the political consultant to Yanukovych, American strategist Paul Manafort. Manafort persuaded Yanukovych that going first to Brussels would demonstrate to all that, as president, Yanukovych intended to bring the changes required to allow Ukraine to apply for formal membership in the EU.

Manafort brought to the Ukrainian political consultancy business a very important rule: An effective leader needs to be consistent as a president with his promises as a candidate. In his presidential campaign, Yanukovych made it clear that it was important for Ukraine to maintain its historical and cultural relationship with Russia. However, Yanukovych had also promised to implement the changes that would begin the modernization of Ukraine that would be necessary for Ukraine to become a part of the EU. The Brussels trip sent this signal loudly and clearly to all – including Russia.

I can't but stipulate that Yanukovych was a bad president and crook who by the end of his rule had effectively lost credibility even of his staunchest supporters. And he finally betrayed them and fled to Russia only to see Ukraine fall into the hands of other kleptocrats now disguised as hooray-patriots and nationalists. But with all that said one shouldn't ignore the fact that Ukraine under Yanukovych made a number of major steps towards the EU and the West in general. And that Manafort was among those who made those paradoxical accomplishments real.

It was that period when Ukraine finally met U.S. requirements to get rid of the stocks of highly enriched uranium that could have potentially been used to produce nuclear weapons. Ukraine used to be the only non-NATO nation that took part in all peace-keeping and anti-terrorist operations of the Alliance world-wide.

With an eye towards 2015, the Yanukovych government – to the surprise of so many in Moscow – managed to negotiate with the EU a huge list of terms for the Deep and Comprehensive Free Trade Agreement, known as the DCFTA. No other nation had accomplished this task over such a brief period of time. Yanukovych's government had the Association Agreement initialed by March 2012. This pace shocked Moscow.

This sense of commitment to the goal is actually the reason why Russia overreacted in the summer 2013 and imposed the trade blockade with Ukraine.

Following the European track created multiple challenges that would never have been solved by a Ukraine government except for the consistent promotion of what had to be done by Manafort.

Legislation such as the Criminal Administrative Code, built on fundamentally new principles consistent with the Western practices and lauded by the Western institutions is one of the vivid examples.

Even at the end of the process, Manafort was engaged in helping the Europeans and the Ukrainians negotiate the final terms.

Just three months before the summit it was the EU, not Yanukovych, who hesitated whether to sign the document or not. And Manafort contributed a lot to change of mood in Brussels and major European capitals while at the same time keeping Ukraine focused on finalizing the details of the DCFTA and Association Agreement. He was doing this while Russia was imposing the trade embargo and threatening even more drastic punishment to

discourage Yanukovych from getting into DCFTA with the EU.

With all that said I can only wonder why some American media dare falsely claim that Paul Manafort lobbied Russian interests in Ukraine and torpedoed the Association Agreement signing. Without his input, Ukraine would not have had the command focus on reforms that were required to be a nation-candidate to the EU.

All listed here facts can be easily verified. If only one pursues the truth, not ends to twist the reality in line with his or her conviction that the dubious goal of undermining Trump's presidency, justifies most dishonest means.

*Oleg Voloshin was a spokesperson of the Ministry of Foreign Affairs of Ukraine under ex-Foreign Minister Konstantin Grishchenko, who served from 2010-2012, during the president of Viktor Yanukovych, ousted by the EuroMaidan Revolution in 2014.*

ADVERTISEMENT

# **EXHIBIT H**

Oleg Voloshin: Paul Manafort, European ~~integration~~integration's unknown soldier

Oleg Voloshyn, former spokesperson of the Ministry of Foreign Affairs of ~~for~~ Ukraine

~~EU~~By Oleg Voloshin.

The European Union – Ukraine Association Agreement might have never appeared but for a person now falsely accused of lobbying Russian interests.

The night of March 4, 2010, turned out to be a nervous one for the staff of Ukrainian ~~embassy~~Embassy in Moscow where I used to be a press-attaché.

The first visit to Russia of newly elected ~~president~~President Viktor Yanukovich was on the brink of cancellation. The Kremlin wouldn't grant the already scheduled visit an official status. Russian state media also ~~cancelled~~canceled earlier agreed interviews with members of the Yanukovich team. The explanation was rather simple although possibly unusual for contemporary observers who had a mistaken and simplified perception of the fourth Ukrainian president: The Russian leadership was annoyed at Yanukovich's decision to pay his first visit after inauguration to Brussels before heading to Moscow.

Even Viktor Yushchenko, upon taking office as Ukraine's third president in 2005, did the opposite. There was one person the Russians blamed for this "treason of special relationship with brother nation": the political consultant to ~~Viktor Yanukovich~~Yanukovich, American strategist Paul Manafort. Manafort persuaded ~~Yanukovich~~Yanukovich that going first to Brussels would demonstrate to all that, as ~~President, Yanukovich~~president, Yanukovich intended to bring the changes required to allow Ukraine to apply for formal membership in the ~~European Union. EU.~~

Manafort brought to the Ukrainian political consultancy business a very important rule: An effective leader needs to be consistent as a ~~President~~president with his promises as a candidate. In his ~~Presidential~~presidential campaign, ~~VY, Yanukovich~~ made it clear that it was important for Ukraine to maintain its historical and cultural relationship with Russia. However, ~~Yanukovich~~Yanukovich had also promised to implement the changes that would begin the modernization of Ukraine that would be necessary for Ukraine to become a part of the EU. The Brussels trip sent this signal loudly and clearly to all – including Russia.

~~Also, during these early months, VY implemented other important policy changes that signaled he was serious about moving Ukraine into the western orbit:~~

~~HERE NEED TO ADD a couple of major reforms that VY brought to country in order to position Ukraine to apply for membership. Reforms that changed a Soviet based legal-economic framework to a western one. (increase of NATO exercises/ Nuclear deal/~~

I can't but stipulate that Yanukovich was a bad president and crook who by the end of his rule had effectively lost credibility even of his staunchest supporters. And he finally betrayed them and fled to Russia only to see Ukraine fall into the hands of other kleptocrats now disguised as hooray-patriots and nationalists. But with all that said one shouldn't ignore the fact that Ukraine under Yanukovich made a number of major steps towards the EU and the West in general. And that Manafort was among those who made those paradoxical accomplishments real.

It was that period when Ukraine finally met U.S. requirements to get rid of the stocks of highly enriched uranium that could have potentially been used to produce nuclear weapons. Ukraine used to be the only non-NATO nation that took part in all peace-keeping and anti-terrorist operations of the Alliance world-wide.

With an eye towards 2015, ~~VY~~the Yanukovich government – to the surprise of so many in Moscow – managed to protect the cultural and language concerns of Eastern Ukraine while managing the major changes required for Ukraine to come to negotiate with the EU a huge list of terms with the European bureaucrats debating the particular terms off for the Deep and Comprehensive Free Trade Area (Agreement, known as the DCFTA) with the EU. No other nation had accomplished this task over such a brief period of time. Yanukovich's government had the Association Agreement initialed by March ~~of~~ 2012. This pace shocked Moscow.

This sense of commitment to the goal is actually the reason why Russia overreacted in the summer 2013 and imposed the trade blockade with Ukraine.

Following the European track created multiple challenges that would never ~~had~~have been solved by a Ukraine ~~Government~~government except for the consistent promotion of what had to be done by ~~Paul~~ Manafort.

~~HERE LIST SOME OF THE CHANGES TO LAWS THAT WERE MADE — CIVIL CODE/ELECTORAL CODE ETC.~~



Legislation such as the Criminal Administrative Code, built on fundamentally new principles consistent with the Western practices and lauded by the Western institutions is one of the vivid examples.

Even at the end of the process, Manafort was engaged in helping the Europeans and the Ukrainians negotiate the final terms.

Just three months before the summit it was the EU, not Yanukovych, who hesitated whether to sign the document or not. And Manafort contributed a lot to change ~~the of~~ mood in Brussels and major European capitals while at the same time keeping Ukraine focused on finalizing the details of the DCFTA and Association Agreement. He was doing this while Russia was imposing the trade embargo and threatening even more drastic punishment-- to discourage Yanukovych from getting into DCFTA with the EU.

With all that said I can only wonder why some American media dare falsely claim that Paul Manafort lobbied Russian interests in Ukraine and torpedoed ~~AA~~the Association Agreement signing. Without his input, Ukraine would not have had the command focus on reforms that were required to be a nation-- candidate to the EU.

All listed here facts can be easily verified. If only one pursues the truth--~~Not tends, not ends~~ to twist the reality in line with his or her conviction that the dubious goal of undermining Trump's presidency, justifies most dishonest means.